

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA

Plaintiff,

v.

BINANCE HOLDINGS LIMITED, d/b/a  
BINANCE.COM, and  
CHANGPENG ZHAO, aka “CZ,”

Defendants.

NO. CR23-178 RAJ and  
NO. CR23-179 RAJ

**GOVERNMENT’S SUPPLEMENTAL  
MOTION REGARDING SEAL**

**(FILED UNDER SEAL)**

The Court has previously granted motions sealing these cases, and filings in the cases, until 9:00 a.m. on the morning of the plea hearings (which were not set at the time of the initial motions to seal). The plea hearings are now set to begin at 10:00 a.m. on November 21, 2023. After further consideration the United States requests, with the consent of the Defendants, that the case remain sealed, with no entries on the public calendar or docket, until the plea hearing begins at 10:00 a.m. The United States submits that this adjustment will minimize market disruption and inaccurate speculation that could harm third parties.

1 DATED this 20<sup>th</sup> day of November, 2023.

2  
3 MARGARET A. MOESER  
4 Acting Chief  
5 Money Laundering and Asset Recovery  
6 Section, Criminal Division  
7 U.S. Department of Justice

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8 /s Kevin G. Mosley  
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13 Acting Chief  
14 Counterintelligence and Export Control Section, National Security Division  
15 U.S. Department of Justice

16 /s Beau D. Barnes  
17 Beau D. Barnes  
18 Alex Wharton  
19 Trial Attorneys

**CERTIFICATE OF SERVICE**

I, Michael Dion certify that I served this filing by email on counsel for the defense on November 20, 2023.

/s Michael Dion  
MICHAEL DION  
Assistant United States Attorney